

LAURA ROSENBAUM, OSB No. 110061
laura.rosenbaum@stoel.com
STOEL RIVES LLP
760 SW Ninth Avenue, Suite 300
Portland, OR 97205
Tel: (503) 224-3380
Fax: (503) 220-2480

DANIEL PRINCE, Cal. SB# 237112 (*pro hac vice*)
danielprince@paulhastings.com
FELICIA A. DAVIS, Cal. SB# 266523 (*pro hac vice*)
feliciadavis@paulhastings.com
LINDSEY C. JACKSON, Cal SB# 313396 (*pro hac vice*)
lindseyjackson@paulhastings.com
ALYSSA K. TAPPER, Cal. SB# 324303 (*pro hac vice*)
alyssatapper@paulhastings.com
PAUL HASTINGS LLP
515 South Flower Street, 25th Floor
Los Angeles, CA 90071
Tel: (213) 683-6000
Fax: (213) 627-0705

Attorneys for Defendant NIKE, INC.
[Additional counsel of record listed on signature page]

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

KELLY CAHILL, SARA JOHNSTON,
LINDSAY ELIZABETH, and HEATHER
HENDER, individually and on behalf of
others similarly situated,

Plaintiffs,

v.

NIKE, INC., an Oregon Corporation,

Defendant.

Case No.: 3:18-cv-01477-AB

**JOINT STATUS REPORT
REGARDING NIKE'S MOTION FOR
ATTORNEYS' FEES [ECF No. 567]**

NIKE, Inc. (“NIKE”) and Markowitz Herbold PC (“Markowitz,” and together with NIKE, the “Parties”) through their respective counsel submit this status report regarding NIKE’s motion for attorneys’ fees (the “Attorneys’ Fees Motion”) pursuant to the Court’s order at ECF No. 626.

On February 21, 2025, the Court ordered the Parties to inform the Court by March 7, 2025, whether “they wish to lift the stay” on NIKE’s Attorneys’ Fees Motion (ECF No. 567). On March 7, 2025, the Parties notified the Court that the Parties had accepted a mediator’s proposal to resolve NIKE’s motion and were in the process of memorializing the agreed settlement terms. (*See* ECF No. 626.) The Parties also requested leave to update the Court regarding their progress on April 11, 2025. (*See id.*) Thereafter, the Court entered an order directing the parties to file a status report to inform the Court whether they have resolved the Attorneys’ Fees Motion on April 11, 2025. (*Id.*) The Court extended the deadline for the parties to jointly update the court regarding resolution of the Attorneys’ Fees Motion until May 2, 2025. (*See* ECF No. 632.)

The Parties have been working in good faith to memorialize a long-form agreement, and that process is ongoing. The Parties believe that more time is needed to complete their discussions and hereby request an additional 14-days (until May 16, 2025) to update the Court regarding a resolution of the Attorneys’ Fees Motion. The Parties also request that the Court continue the stay on the Attorneys’ Fees Motion, as set by ECF No. 574.

Dated: May 2, 2025

s/ Daniel Prince (by e-mail consent)

Daniel Prince, Cal. SB# 237112 (*pro hac vice*)
danielprince@paulhastings.com
Felicia A. Davis, Cal. SB# 266523 (*pro hac vice*)
feliciadavis@paulhastings.com
Lindsey C. Jackson, Cal. SB# 313396 (*pro hac vice*)
lindseyjackson@paulhastings.com
Alyssa K. Tapper, Cal. SB# 324303 (*pro hac vice*)
alyssatapper@paulhastings.com
PAUL HASTINGS LLP
515 South Flower Street, Twenty-Fifth Floor
Los Angeles, CA 90071-2228
Tel: (213) 683-6000
Fax: (213) 627-0705

Laura Rosenbaum, OSB No. 110061
Laura.rosenbaum@stoel.com
STOEL RIVES LLP
760 SW Ninth Avenue, Suite 3000
Portland, OR 97205
Tel: (503) 224-3380
Fax: (503) 220-2480

Attorneys for Defendant NIKE, Inc.

Dated: May 2, 2025

s/ David A. Bernstein

David J. Elkanich, OSB No. 992558
Email: delkanich@buchalter.com
David A. Bernstein, OSB No. 235633
Email: dbernstein@buchalter.com
Telephone: 503.226.1191

Attorneys for Non-Party Markowitz Herbold PC

SIGNATURE ATTESTATION

In accordance with Civil Local Rule 11(b)(2), I attest that concurrence in the filing of this document has been obtained from the signatories on this e-filed document.

Dated: May 2, 2025

Respectfully submitted,

PAUL HASTINGS LLP

s/ Daniel Prince (by e-mail consent)

Daniel Prince (*pro hac vice*)

[PROPOSED] ORDER

The parties are ordered to provide a joint status report regarding NIKE's motion for attorneys' fees (ECF No. 567) and whether the parties wish to lift the stay on such motion, as set by ECF No. 574, by May 16, 2025.

IT IS SO ORDERED.

Dated:

HON. AMY BAGGIO
United States District Judge